

United States Courts
Southern District of Texas
FILED

APR 23 2018

David J. Bradley, Clerk of Court

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

GWENDOLYN P. WRIGHT

Index No. 4:17-cv-01838

Plaintiff

against

Marriott International, Inc.; Courtyard Management Corporation; Marriott Worldwide Reservation Services, L.L.C.; MIF, LLC; Marriott International, Inc., Host Marriott Corporation (f/k/a Marriott Corporation, "Host Marriott"); Marriott International, Inc. ("MII"); Host Marriott Services Corporation; Host Marriott Corporation" ("Host REIT"); CTYD III Corporation, Courtyard by Marriott; LBA Hospitality, Larry Blumberg and Associates, Inc.; LBAM-Investor Group, L.L.C.; LBAM-JALARAM, L.L.C.; LBAM-VRAMA, LLC; LBAM-KEY, LLC; LBAM-3H, LLC; Apple REIT Companies; Apple Hospitality REIT, Inc., Apple REIT; LARRY BLUMBERG; ROBERT DIETRICH; PHILIP BARROCAS; MARY EWING; MARSHA CANNON; FARRAH ADAMS; BARBARA ISRAEL; ELIZABETH B. GLASGOW, Farmer Price Hornsby and Weatherford.

Plaintiff's Fourth Supplemental Petition

I.

Plaintiff is a citizen of the United States and resides in the county of Harris, State of Texas, which is in this judicial district.

II.

To include Elizabeth B. Glasgow, Attorney Farmer Price Hornsby and Weatherford and all previously named Defendants all sued in their official capacities.

III.

To include Civil Rule of Procedure, 8 and all previous rules as stated in the laws of U.S., Texas, Harris County for employees, such as the Plaintiff and to ensure that the U.S. and state laws under these acts are followed in accordance with federal and state law.

IV.

Defendants, are the combined individuals, businesses, corporations, subsidiaries and legal representatives, liable jointly and severally for the observance, adherence, compliance and administration of each of these laws, as stated in the laws of the U.S., Texas State, Harris County, for persons such as the Plaintiff.

V.

To include Counsel for Defendants, Elizabeth B. Glasgow, being a United States Attorney, bound by law to uphold an oath to use no falsehood, nor delay the cause of any person and abide by the Rules of Professional Conduct.

GENERAL ALLEGATIONS AMENDED

Plaintiff contemplated death by suicide after learning that Defendant had indeed hired Elizabeth B. Glasgow, Farmer Price Hornsby and Fisher, before her forced resignation. Plaintiff feared for her physical and mental health, stability and legal capacity to fight for her rights, to which she was not financially able to withstand. Email evidence was composed by LBA Human Resources Director and copied to Plaintiff while at home ill. Evidence is undeniable proof of Attorney Glasgow's

involvement in matters concerning on-going complaints of discrimination. This evidence was the final contributing factor in Plaintiff's forced quit.

Allegations Restated Amended

1. According to Rule 8 of General Rules of Pleadings, Plaintiff contends that attorney for Defendant falsified documents and made false statements that she was not legal counsel for the Defendant. On or around July 3, 2017, Attorney Elizabeth B. Glasgow, forwarded all of the Plaintiff's documents to other legal counsel, as verified through emails by Attorney, Joseph W. Gagnon. Elizabeth B. Glasgow represented the Defendant up to the date of receipt of Plaintiff's Request for Admissions and continued to act as legal counsel by communicating and forwarding official Court documents to the Defendant.

2. Plaintiff contends that Elizabeth B. Glasgow shared EEOC, TWC and other pertinent information, including on-going reports of harassment by the Plaintiff while employed by the Defendant, as verified with threats of sanctions against her by Joseph Gagnon of Fisher & Phillips LLC.

3. Plaintiff contends that Elizabeth B. Glasgow only recused herself from the case after realizing the Plaintiff indeed had email evidence against her that was overwhelming and indisputable as participating in and/or directing the acts of

duress, estoppel, illegality, laches, failure of consideration, fraud and statute of fraud.

4. According to Texas Rule of Procedure, 106a (2), Rule 21a, Rule 106a (2), Rule 106b, Rule 8.4 (a)(b)(c)(d)(e)(f)(g), Rule 3.4, Rule 0.1(i) and Rule 0.1(i), Plaintiff has properly served Defendants. Plaintiff has continued to serve copies of all documents to the Defendant, by U.S. Certified Mail. With each service, Elizabeth B. Glasgow, has contacted Plaintiff acknowledging receipt and knowledge of documents by mail yet, claiming she is no longer representing the Defendant.

5. Plaintiff submitted irrefutable evidence of Defendants Marsha Cannon, Farrah Adams, Philip Barrocas, Robert Dietrich and attorney Elizabeth B. Glasgow discussing her claim, before her forced resignation.

6. According to Civil Rule of procedure, Rule 8, Plaintiff fought and won Unemployment benefits during TWC Hearing with Officer D. Mitchell, as documented in reports. Recording confirms Elizabeth B. Glasgow as Defendant's legal representative. Attorney Glasgow also submitted false statements to EEOC, that Plaintiff left her job for reasons other than constructive firing. During the time of her statement, legal counsel for the Defendant did indeed have evidence of Plaintiff's resignation letter which stated her reason for forced resignation being discrimination, bullying and harassment.

7.Elizabeth B. Glasgow negligently failed to submit Plaintiff's QC report to EEOC and TWC, which she had in her possession at the time of her statements. These legal documents undeniably refute Defendants' claim that PIP was justified. The reports served to be unquestionable evidence that inadvertently protected the Plaintiff from defamation and slander by the Defendant.

8.According to Rule 192.5, Plaintiff verily believes Elizabeth B. Glasgow was negligent in directing Defendants and/or not securing and protecting key evidence such as videos, micros key card data, state and federal records and other key evidence in expectance of a future claim against her clients.

9.Elizabeth B. Glasgow used unethical tactics in service of documents to the Plaintiff before TWC hearing. The pretext being to prohibit Plaintiff from presenting information that irrefutably protected her against defamation slander and exclusion of key evidence.

10.Plaintiff contends that Elizabeth B. Glasgow should not be discharged from any obligation, as she by law is bound to the Defendant in this case. Documents signed and submitted by Elizabeth B. Glasgow, as counsel for the Defendant, including appeals to Plaintiff's claim, submitted to TWC and EEOC are indisputable.

Plaintiff has sustained and continues to suffer damages and injuries at the hands of the Defendants. Committed acts of statute of frauds, injury by fellow servant,

illegality, duress, fraud, laches, failure of consideration and contributory negligence were carried out voluntarily or by direction of Elizabeth B. Glasgow and other legal counsel.

According to Rule 316, Plaintiff hereby requests correction of clerical mistakes. On three separate occasions, Plaintiff has been summoned before Judge Frances H. Stacy, the last being scheduled for May 7, 2018, under Case Number 4:17-cv-01666. A Motion to Withdraw was filed by Valli Kane and Vagnini, LLP and granted July 12, 2017.

Contributing Cause Damages Psychological Harassment Amended

To include damages for thoughts of death by suicide caused by counsel for Defendant, Elizabeth B. Glasgow, to be determined by the discretion of the Court.

Injunctive and Affirmative Relief Amended:

To include a letter of apology from Elizabeth B. Glasgow of Farmer Price Hornsby and Weatherford addressed to the Plaintiff.

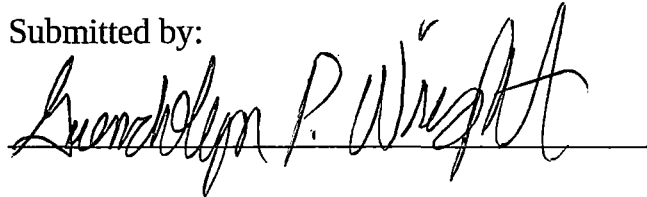
Self-Litigant Counsel Fees Amended:

To include injury to Plaintiff caused by Defendant's legal counsel, Elizabeth B. Glasgow, as determined by the Court's discretion, according to Rule 1.04(b), Tex. Disciplinary R. Prof. Conduct, Rule 48

Certificate of Service

I, Gwendolyn P. Wright, swear that I have served by U.S. Postal Service Certified Mail, a true and correct copy of this her Motion for Summary Judgement to the Court and Defendant on April 9, 2018.

Submitted by:

A handwritten signature in black ink, appearing to read "Gwendolyn P. Wright", is written over a horizontal line.

Gwendolyn P. Wright
3018 Ribbon Creek Way
Spring, Texas 77389